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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF HERB BAER IN
CONNECTION WITH REORGANIZED
DEBTORS' ONE HUNDRED EIGHTEENTH
OMNIBUS OBJECTION TO CLAIMS
(CHARMBURY CLAIMS)**

[Related to Docket No. 13117]

Date: December 20, 2022

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Herb Baer, pursuant to section 1746 of title 28 of the United States Code, hereby declare under
2 penalty of perjury that the following is true and correct to the best of my knowledge, information, and
3 belief:

4 1. I am a Director of Consulting at Kroll Restructuring Administration LLC (formerly
5 known as Prime Clerk LLC) (“**Kroll**”), whose principal office is located at 55 East 52nd Street, New
6 York, NY 10055. Kroll has been retained by the Reorganized Debtors as claims and noticing agent in
7 the Chapter 11 Cases. I submit this Declaration in connection with the *Reorganized Debtors’ One*
8 *Hundred Eighteenth Omnibus Objection to Claims (Charmbury Claims)* [Docket No. 13117] (the
9 “**Objection**”).¹

10 2. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon
11 my personal knowledge, the knowledge of other employees working under and alongside me on this
12 matter, and my review of relevant documents and information. If called upon to testify, I would testify
13 competently to the facts set forth in this Declaration.

14 3. As a general practice, Kroll has been directed by the Reorganized Debtors and their
15 counsel to serve claim settlement offers on individual claimants and (where applicable) their counsel of
16 record by first class mail at the address provided in the proof of claim form. Kroll also serves these
17 documents by email if an email address has been provided by a claimant in their proof of claim or by
18 other means. This practice is intended to accomplish as broad and effective a notice as possible.

19 4. In accordance with its standard practice in these Chapter 11 Cases, Kroll sent copies of
20 ADR Settlement Offers to Claimant to both addresses listed on her Claims as well as by email.

21 5. I am not currently aware of any other claimant in these Chapter 11 Cases that has
22 interpreted service of multiple copies of the same ADR Settlement Offer to indicate that the Reorganized
23 Debtors are making more than one offer on a single proof of claim.

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27 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in
28 the Objection.

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
2 correct to the best of my knowledge, information, and belief. Executed this thirteenth day of December,
3 2022.

4 /s/ Herb Baer
5 Herb Baer
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